

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.

Debtors.¹

PROMESA Title III

Case No. 17-BK-3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

Case No. 17-BK-4780-LTS

**OPENING EXPERT DISCLOSURES OF THE AD HOC GROUP OF PREPA
BONDHOLDERS, ASSURED GUARANTY CORP., ASSURED GUARANTY
MUNICIPAL CORP., SYNCORA GUARANTEE, INC., AND U.S. BANK NATIONAL
ASSOCIATION AS PREPA BOND TRUSTEE RELATED TO
PREPA'S TITLE III PLAN OF ADJUSTMENT**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Court Judge Laura Taylor Swain:

Pursuant to paragraphs 3 and 25 of the Court’s March 3, 2023 *Amended and Restated Order Establishing, Among Other Things, Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith* (the “Procedures Order”) (ECF No. 3305), the Ad Hoc Group of PREPA Bondholders (“Ad Hoc Group”), Assured Guaranty Corp. and Assured Guaranty Municipal Corp. (“Assured”), and Syncora Guarantee Inc. (“Syncora”), and U.S. Bank National Association as PREPA Bond Trustee (the “Trustee,” and collectively, “Bondholders”), respectfully submit these Opening Expert Disclosures:

EXPERT DISCLOSURES

1. Bondholders hereby disclose the identities of the following expert witnesses who may provide opinion testimony on behalf of Bondholders with respect to confirmation of the *Modified Second Amended Title III Plan of Adjustment of the Puerto Rico Electric Power Authority* (ECF No. 3296) (as it may be amended, modified, or supplemented), not including any rebuttal expert witnesses, pursuant to Federal Rule of Civil Procedure 26(a)(2)(B):²

- a. Maureen M. Chakraborty, Managing Principal at Analysis Group, Inc.;
- b. Sebastian Edwards, Professor of Business Economics at the Anderson Graduate School of Management and the Henry Ford II Chair in International Management at the University of California, Los Angeles;
- c. Gary Strumeyer, President and CEO of Strumeyer Consulting LLC;
- d. Thomas S. Terry, CEO of The Terry Group; and
- e. Susan F. Tierney, Senior Advisor at Analysis Group, Inc.

² In accordance with paragraph 25 of the Procedures Order, any opening expert reports from the disclosed individuals shall be filed by April 28, 2023.

2. Bondholders reserve the right to amend these Expert Disclosures in accordance with the Procedures Order. Bondholders also reserve the right to designate these individuals and/or identify different individuals as rebuttal experts in accordance with the Procedures Order.

WHEREFORE Bondholders respectfully request that the Court take notice of the foregoing.

We hereby certify that, on this same date, we electronically filed the foregoing with the clerk of the Court using the CM/ECF system, which will notify the attorneys of record.

Dated: San Juan, Puerto Rico
April 14, 2023

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